

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

SMARTMATIC USA CORP.,
SMARTMATIC INTERNATIONAL
HOLDING B.V. and SGO CORPORATION
LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY PILLOW,
INC.,

Defendants.

Case No. 22-cv-00098-WMW-JFD

DECLARATION OF AMAN BHULLAR

I, Aman Bhullar, declare:

1. I am employed by the County of Los Angeles, California, as an Assistant Registrar-Recorder/County Clerk. I am in charge of the information technology bureau of the Registrar-Recorder/County Clerk's office. In that capacity, I have responsibility for, and knowledge of, the Voting Solutions for All People (VSAP) election system developed and used by the Los Angeles County Registrar-Recorder/County Clerk.

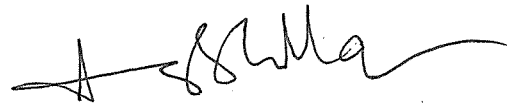
2. The VSAP system includes ballot marking devices (BMDs) on which software is installed. The software version used for the November 2020 election was VSAP Voting System 2.2. Before that election, the VSAP Voting System 2.2 software was tested by an independent testing authority accredited by the Election Assistance Commission. After completion of the independent testing, the Los Angeles County Registrar-Recorder/County Clerk's office deposited

the VSAP Voting System 2.2 source code into an escrow facility approved by the State of California, in accordance with the California Elections Code.

3. The source code for the VSAP Voting System 2.2 BMD software used for the November 2020 election presently remains in the escrow.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 14, 2023.

A handwritten signature in black ink, appearing to read 'Aman Bhullar', is written over a horizontal line.

Aman Bhullar